

Exhibit A

Plaintiff's Interrogatories to Defendant

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Michele Swetland	:	
1315 Bruce Road	:	
Oreland, PA 19075	:	
Plaintiff	:	12-cv-02474
Vs.	:	
PHILIPS AND COHEN	:	
AND ASSOCIATES	:	
1002 JUSTISON STREET	:	
WILMINGTON, DE 19801	:	Jury Trial Demanded
and	:	
John Does 1-10	:	
and	:	
XYZ Corporations,	:	
Defendant(s)	:	

**PLAINTIFF'S FIRST SET OF INTERROGATORIES
PROPOUNDED TO DEFENDANT(S)**

Kindly serve answers to the following questions upon Plaintiff's Attorney, Vicki Piontek, Esquire, 951 Allentown Road, Lansdale, PA 19466. You may send the answers by email, fax or regular mail. Please use separate sheets of paper to answer each numbered interrogatory. Please provide answers within 30 days of the case management conference.

1. Set forth the name, address and telephone number, title and position of each person furnishing information used to answer these interrogatories.
2. Indicate the caption, location and docket numbers of all civil suits filed against Defendant(s) in the past 5 years pursuant to the Fair Debt Collection Practices Act, 15 USC 1692 et. seq. and / or the Telephone Consumer Protection Act, 47 USC § 227 et. seq.

3. Provide the names, addresses and phone numbers of all agents, employees or representatives of Defendant(s) who had telephone contact with Plaintiff.
4. Indicate the dates and times of all telephone calls placed by Defendant(s) to Plaintiff pertaining to Plaintiff's consumer account. For each phone call placed by Defendant(s) regarding the aforementioned account, provide the date and time.
5. Indicate all telephone numbers Defendant(s) used to contact Plaintiff.
6. Indicate whether Defendant(s) was acting as the owner of the alleged account which was the subject of Defendant(s) communications with Plaintiff, or if Defendant(s) was acting as a 3rd party bill collector.
7. If Defendant was not the owner of the account, indicate the name, address and phone number of the owner of the alleged account that was the subject of Defendant(s) communications with Plaintiff.
8. Indicate the name, address and phone number of the original alleged creditor for the alleged account that was the subject of Defendant(s) communications with Plaintiff.
9. Indicate how Defendant obtained the telephone number that Defendant(s) used to contact Plaintiff.

10. Set forth the names, addresses and telephone numbers of any and all services which provide Defendant(s) with skip tracing, telephone numbers or location information for the purpose of collecting on consumer accounts.
11. Indicate the make and model any and all computers, telephones or other equipment used by Defendant(s) to contact Plaintiff.
12. Provide digital pictures of any and all computers, telephones or other equipment used by Defendant(s) to contact Plaintiff.

Wherefore, please respond by furnishing the requested information and documents within thirty days of the case management conference.

Respectfully Submitted,

Vicki Piontek
Vicki Piontek, Esquire
Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
palaw@justice.com
877-737-8617
Fax: 866-408-6735

5-29-12
Date

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Michele Swetland
1315 Bruce Road
Oreland, PA 19075

Plaintiff

12-cv-02474

Vs.

PHILIPS AND COHEN
AND ASSOCIATES
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WILMINGTON, DE 19801

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and

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and

XYZ Corporations,

Defendant(s)

VERIFICATION

I, _____, have read the answers to the attached answers to interrogatories. Under penalty of Federal Law, I affirm that the answers stated are true and correct to the best of my knowledge, understanding and belief.

Signature

Date

Name

Title

UNITED STATES DISTRICT COURT
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Michele Swetland
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Plaintiff

12-cv-02474

Vs.

PHILIPS AND COHEN
AND ASSOCIATES
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WILMINGTON, DE 19801

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and

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and

XYZ Corporations,

Defendant(s)

CERTIFICATE OF SERVICE

Attorney Vicki Piontek affirms that she is the attorney for the above captioned Plaintiff, and that she sent by First Class U.S. Mail, postage pre-paid a true and correct copy of the attached interrogatories to the following parties at the following addresses.

AARON R. EASLEY, ESQUIRE
SESSIONS FISHMAN NATHAN ISRAEL LLC
200 ROUTE 31 NORTH SUITE 203
FLEMINGTON, NJ 08822

Vicki Piontek
Vicki Piontek, Esquire
Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
877-737-8617
palaw@justice.com
Fax: 866-408-6735

5/29/12
Date of Service